

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

VERSUS TECHNOLOGY, INC.,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 04-1231 (SLR)
)	
RADIANCE, INC.,)	
)	
Defendant.)	
)	

**PLAINTIFF’S REPLY TO DEFENDANT’S
SECOND AMENDED COUNTERCLAIM**

Plaintiff, Versus Technology, Inc. (“Plaintiff”) respectfully submits this Reply to defendant, Radianse, Inc.’s (“Defendant”) Second Amended Counterclaim (“Counterclaim”).

REPLY TO COUNTERCLAIM

1. Plaintiff admits that the Court has jurisdiction over the Counterclaim. Plaintiff denies the remaining allegations of paragraph 1.
2. Plaintiff admits the allegations of paragraph 2.
3. Plaintiff admits the allegations of paragraph 3.
4. Plaintiff admits the allegations of paragraph 4.
5. Plaintiff denies the allegations of paragraph 5.
6. Plaintiff denies the allegations of paragraph 6.
7. Plaintiff denies the allegations of paragraph 7.
8. Plaintiff denies the allegations of paragraph 8.
9. Plaintiff denies the allegations of paragraph 9.
10. Plaintiff admits the allegations of paragraph 10.

11. Plaintiff admits the allegations of paragraph 11.
12. Plaintiff admits the allegations of paragraph 12.
13. Plaintiff denies the allegations of paragraph 13.
14. Plaintiff denies the allegations of paragraph 14.
15. Plaintiff lacks sufficient information to admit or deny the allegations of paragraph 15 and therefore denies the allegations of paragraph 15.
16. Plaintiff denies the allegations of paragraph 16.
17. Plaintiff denies the allegations of paragraph 17.
18. Plaintiff denies the allegations of paragraph 18.
19. Plaintiff denies the allegations of paragraph 19.

PRAYER FOR RELIEF

Wherefore, Plaintiff respectfully requests that:

- a) Defendants take nothing by way of their Counterclaim;
- b) The Court deny the declaratory judgments requested by the Counterclaim;
- c) Plaintiff be awarded the relief sought in the Complaint; and
- d) The Court award Plaintiff such other relief as is just and proper.

This Reply filed the 18th day of April, 2005.

/s/ James M. Lennon
George Pazuniak (DE #478)
Gerard M. O'Rourke (DE #3265)
James M. Lennon (DE #4570)
CONNOLLY, BOVE, LODGE & HUTZ LLP
1007 North Orange Street
P.O. Box 2207
Wilmington, DE 19899
Telephone: (302) 658-9141

Counsel for Plaintiff, Versus Technology, Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

CERTIFICATE OF SERVICE

I hereby certify that on April 18, 2005, I electronically filed this PLAINTIFF'S REPLY TO DEFENDANT'S SECOND AMENDED COUNTERCLAIM with the Clerk of the Court using CM/ECF, and served the following by the manner so indicated:

By Hand, Email and CM/ECF notification:

Josy W. Ingersoll (#1088)
jingersoll@ycst.com
YOUNG CONAWAY STARGATT
& TAYLOR LLP
The Brandywine Building
1000 West Street, 17th Floor
P.O. Box 391
Wilmington, DE 19899-0391
(302) 571-6600
Counsel for Defendant, Radianse, Inc.

By Email:

Sibley P. Reppert
spr@lahive.com
LAHIVE & COCKFIELD
28 State Street
Boston, MA 02109-1784
(617) 227-7400
Co-Counsel for Defendant, Radianse, Inc.

DATE: April 18, 2005

/s/ James M. Lennon
George Pazuniak (DE #478)
Gerard M. O'Rourke (DE #3265)
James M. Lennon (DE #4570)
CONNOLLY, BOVE, LODGE & HUTZ LLP
1007 North Orange Street
P.O. Box 2207
Wilmington, DE 19899
Telephone: (302) 658-9141

Counsel for Plaintiff, Versus Technology, Inc.